

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY	
Caption in Compliance with D.N.J. LBR 9004-1(b) LEVY KONIGSBERG, LLP Moshe Maimon, Esq. mmaimon@levylaw.com 605 Third Avenue, 33 rd Floor New York, NY 10158 Tel: (212) 605-6200 Fax: (212) 605-6290 <i>Counsel for Certain Talc Claimants</i>	
In Re: LTL MANAGEMENT, LLC,¹ Debtor.	Chapter 11 Case No.: 23-12825 (MBK) Honorable Michael B. Kaplan

CLAIMANTS' OPPOSITION TO DEBTOR'S MOTION FOR AN ORDER:
(I) AUTHORIZING IT TO FILE A LIST OF THE TOP LAW FIRMS WITH TALC CLAIMS AGAINST THE DEBTOR IN LIEU OF THE LIST OF THE 20 LARGEST UNSECURED CREDITORS; (II) APPROVING CERTAIN NOTICE PROCEDURES FOR TALC CLAIMANTS; AND (III) APPROVING THE FORM AND MANNER OF
NOTICE OF COMMENCEMENT OF THIS CASE

1) The law firm of Levy Konigsberg LLP ("LK"), on behalf of their various talc claimants ("Claimants")², through their undersigned counsel, hereby submit this objection to the motion of Debtor LTL Management LLC ("Debtor") for an Order Authorizing Debtor to File a List of the Top Law Firms With Talc Claims Against the Debtor in Lieu of the List of the 20

¹ The last four digits of the Debtor's taxpayer identification number are 6622. The Debtor's address is 501 George Street, New Brunswick, New Jersey 08933.

² Some of the talc claimants who currently suffer from malignant mesothelioma caused by the asbestos in the Johnson's Baby Powder they used and were exposed to include, but are not limited to: Vishwanath Avancha, Manerva Awad, Mary Black, Randy Derouen, Elif Doganalp, Lara Fahnländer, Kim Gray, Virginia Harrington, Mary Iacuzzo, William Korbholz, Dominica LaBarr-Mabry, Stephen Lanzo, Christine Lord, David Lum, Nancy Piccolo and Candyse Stanford.

Largest Unsecured Creditors (the “Motion”). [Dkt. 10.]

2) LK joins in the Opposition filed by the law firm of Kazan McClain, Satterley & Greenwood. [Dkt. 73] In addition to the compelling reasons set forth therein to deny the Debtor’s requested relief, the lack of *bona fides* of the motion and the press releases surrounding it further require its denial.

3) Specifically, on April 3, 2023 Watts Guerra LLP issued a Press Release dated April 3, 2023-claiming that the law firms that support J&J’s deal are: [1] Watts Guerra LLC; [2] Onder Law; [3] Nachawati Law Group; [4] Ferrer Poirot Wansbrough; [5] Lanier Law Firm; [6] Johnson Law Group; [7] Pulaski Law Firm, PLLC; [8] Trammell PC; [9] McDonald Worley; [10] Seeger Weiss; [11] Slater, Slater & Schulman; [12] Linville Law Group; and [13] Carabin Shaw LLP. See <https://wattsguerra.com/8-9-billion-settlement-against-jj-for-talc-clients/>.

4) Hand in glove with this, J&J counsel Allison Brown publicly represented that J&J’s plan is “currently supported by roughly 70,000 claimants and numerous plaintiff law firms.”³ (emphasis added).

5) As set forth in more detail in the INFORMATIONAL BRIEF OF THE AD HOC COMMITTEE OF CERTAIN TALC CLAIMANTS REGARDING SECOND BANKRUPTCY FILING BY LTL MANAGEMENT, LLC [Dkt.79 at 18-27], neither is true.

6) There is simply no basis for the assertion that any cancer victim has given his/her consent and support for J&J’s undisclosed plan – let alone the number claimed by J&J’s counsel. At most, some law firms representing a minority of talc claimants with filed cases against J&J have pledged to support its plan. Tellingly, they are prominent in the “Top 18” the Debtor wants to list.

³ <https://news.bloomberglaw.com/bankruptcy-law/j-j-begins-audacious-return-to-failed-cancer-settlement-tactic>

7) However, as for the *support* of the law firms listed in the Watts press release, already two of the firms who purportedly “support J&J’s plan” have disclaimed this misrepresentation. In other words, the representations in the Debtor’s motion are – at best – suspect. Moreover, even when it actually filed cases in other litigations, the Watts firm⁴ has – in the past – not had the vast number of clients it thought it did. "The Lawyer Whose Clients Didn't Exist" <https://www.theatlantic.com/magazine/archive/2020/05/bp-oil-spill-shrimpers-settlement/609082/> It may well be – as Mr. Watts has asserted – that this was the result of internal fraud that he was completely unaware of (and we have no reason to doubt him on this); but the integrity of this Court and its procedures should not be put at risk. Yet, based on faulty information and misrepresentations that is exactly what the Debtor’s motion does.

8) Following Rule 1007(d) and following the law will ensure that the Top 20 List used by the United States Trustee is as reliable as possible, and there is no legitimate reason to deviate from either.

9) Accordingly, Claimants request that this Court deny Debtor’s motion authorizing it to file a list of “Top Law Firms” and instead order Debtor to submit a list pursuant to Rule 1007(d), and for such other relief as to which Claimants may be entitled.

Respectfully submitted:

LEVY KONIGSBERG LLP

By: /s/ Moshe Maimon

MOSHE MAIMON

DATED: April 10, 2023

⁴ According to Exhibit A of the LTL 2.0 Preliminary Injunction Complaint, Watts Guerra LLP does not have a single filed talc lawsuit against J&J, the Debtor, or any of its affiliates.

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LEVY KONIGSBERG, LLP Moshe Maimon, Esq. <u>mmaimon@levylaw.com</u> 605 Third Avenue, 33 rd Floor New York, NY 10158 Tel: (212) 605-6200 Fax: (212) 605-6290 <i>Counsel for Certain Talc Claimants</i>	
In Re: LTL MANAGEMENT, LLC, Debtor.	Chapter 11 Case No.: 23-12825 (MBK) Honorable Michael B. Kaplan

CERTIFICATE OF SERVICE

1. I, Maria Mastrogiacomo :

I am the Secretary/Paralegal for Moshe Maimon, Esq., who represents Various Talc Claimants in this matter.

2. On April 10, 2023, I sent a copy of the following pleadings and/or documents to the parties listed in the chart below.

**CLAIMANTS' OPPOSITION TO DEBTOR'S MOTION FOR AN ORDER:
(I) AUTHORIZING IT TO FILE A LIST OF THE TOP LAW FIRMS WITH TALC CLAIMS AGAINST THE DEBTOR IN LIEU OF THE LIST OF THE 20 LARGEST UNSECURED CREDITORS; (II) APPROVING CERTAIN NOTICE PROCEDURES FOR TALC CLAIMANTS; AND (III) APPROVING THE FORM AND MANNER OF NOTICE OF COMMENCEMENT OF THIS CASE**

3. I certify under penalty of perjury that the above documents were sent using the mode of service indicated.

Dated: April 10, 2023

/s/ Maria Mastrogiacomo
Signature

Name and address of Party Served	Relationship of Party to the Case	Mode of Service
Paul R. DeFilippo Wollmuth Maher & Deutsch LLP 500 Fifth Avenue New York, NY 10110 pdefilippo@wmd-law.com	Attorneys for Debtor;	<input type="checkbox"/> Hand-Delivered <input type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input checked="" type="checkbox"/> Other <u>ECF</u> (As authorized by the Court or by rule. Cite the rule if applicable)
James N. Lawlor jlawlor@wmd-law.com	Attorneys for Debtor	<input type="checkbox"/> Hand-Delivered <input type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input checked="" type="checkbox"/> Other <u>ECF</u> (As authorized by the Court or by rule. Cite the rule if applicable)
Kenneth A. Rosen krosen@lowenstein.com	Attorneys for Debtor	<input type="checkbox"/> Hand-Delivered <input type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input checked="" type="checkbox"/> Other <u>ECF</u> (As authorized by the Court or by rule. Cite the rule if applicable)
Derek J. Baker dbaker@reedsmith.com	Attorneys for Cyprus Mines Corporation	<input type="checkbox"/> Hand-Delivered <input type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input checked="" type="checkbox"/> Other <u>ECF</u> (As authorized by the Court or by rule. Cite the rule if applicable)
John Zachary Balasko john.z.balasko@usdoj.gov	On behalf of Creditor UNITED STATES OF AMERICA	<input type="checkbox"/> Hand-Delivered <input type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input checked="" type="checkbox"/> Other <u>ECF</u> (As authorized by the Court or by rule. Cite the rule if applicable)

Name and address of Party Served	Relationship of Party to the Case	Mode of Service
Walter Benzija wbenzija@halperinlaw.net	Attorneys for Blue Cross Blue Shield Association	<input type="checkbox"/> Hand-Delivered <input type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input checked="" type="checkbox"/> Other <u>ECF</u> (As authorized by the Court or by rule. Cite the rule if applicable)
Lauren Bielskie lauren.bielskie@usdoj.gov	Attorneys for U.S. Trustee	<input type="checkbox"/> Hand-Delivered <input type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input checked="" type="checkbox"/> Other <u>ECF</u> (As authorized by the Court or by rule. Cite the rule if applicable)
		<input checked="" type="checkbox"/> Other <u>ECF</u> (As authorized by the Court or by rule. Cite the rule if applicable)
Alan J. Brody brody@gtlaw.com	Attorneys for Bausch Health Americas, Inc. f/k/a Valeant Pharmaceuticals International	<input type="checkbox"/> Hand-Delivered <input type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input checked="" type="checkbox"/> Other <u>ECF</u> (As authorized by the Court or by rule. Cite the rule if applicable)
E. Richard Dressel rdressel@lexnovalaw.com	On behalf of Creditor Evan Plotkin and Creditor Giovanni Sosa	<input type="checkbox"/> Hand-Delivered <input type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input checked="" type="checkbox"/> Other <u>ECF</u> (As authorized by the Court or by rule. Cite the rule if applicable)
Brian W. Hofmeister bwh@hofmeisterfirm.com	Attorneys for Law Firm of Brian W. Hofmeister on behalf of various claimants	<input type="checkbox"/> Hand-Delivered <input type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input checked="" type="checkbox"/> Other <u>ECF</u> (As authorized by the Court or by rule. Cite the rule if applicable)

Name and address of Party Served	Relationship of Party to the Case	Mode of Service
Andrew J. Kelly akelly@kbtlaw.com	Attorneys for Blue Cross Blue Shield of Massachusetts, Inc.	<input type="checkbox"/> Hand-Delivered <input type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input checked="" type="checkbox"/> Other <u>ECF</u> (As authorized by the Court or by rule. Cite the rule if applicable)
Daniel Lapinski dlapinski@motleyrice.com	Attorneys for Motley Rice LLC	<input type="checkbox"/> Hand-Delivered <input type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input checked="" type="checkbox"/> Other <u>ECF</u> (As authorized by the Court or by rule. Cite the rule if applicable)
Mitchell Malzberg mmalzberg@mjmalzberglaw.com	On behalf of Various Creditor Claimants	<input type="checkbox"/> Hand-Delivered <input type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input checked="" type="checkbox"/> Other <u>ECF</u> (As authorized by the Court or by rule. Cite the rule if applicable)
Brian J. McCormick bmccormick@rossfeller Casey.com	Attorneys for Ross Feller Casey LLP	<input type="checkbox"/> Hand-Delivered <input type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input checked="" type="checkbox"/> Other <u>ECF</u> (As authorized by the Court or by rule. Cite the rule if applicable)
Suzanne Ratcliffe sratcliffe@mrhfmlaw.com	On behalf of Creditor Jan Deborah Michelson-Boyle and Creditor Katherine Tollefson	<input type="checkbox"/> Hand-Delivered <input type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input checked="" type="checkbox"/> Other <u>ECF</u> (As authorized by the Court or by rule. Cite the rule if applicable)

Name and address of Party Served	Relationship of Party to the Case	Mode of Service
Sommer Leigh Ross slross@duanemorris.com	Attorneys for Republic Indemnity Company of America	<input type="checkbox"/> Hand-Delivered <input type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input checked="" type="checkbox"/> Other <u>ECF</u> (As authorized by the Court or by rule. Cite the rule if applicable)
Jeffrey M. Sponder jeffrey.m.sponder@usdoj.gov	Attorneys for U.S. Trustee	<input type="checkbox"/> Hand-Delivered <input type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input checked="" type="checkbox"/> Other <u>ECF</u> (As authorized by the Court or by rule. Cite the rule if applicable)
Clay Thompson cthompson@mrhfmllaw.com	On behalf of Creditor Jan Deborah Michelson-Boyle, Creditor Katherine Tollefson and Interested Party Maune Raichle Hartley French & Mudd, LLC	<input type="checkbox"/> Hand-Delivered <input type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input checked="" type="checkbox"/> Other <u>ECF</u> (As authorized by the Court or by rule. Cite the rule if applicable)
US Trustee USTPRegion03.NE.ECF@usdoj.gov	US Trustee	<input type="checkbox"/> Hand-Delivered <input type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input checked="" type="checkbox"/> Other <u>ECF</u> (As authorized by the Court or by rule. Cite the rule if applicable)
Allen J. Underwood, II aunderwood@litedepalma.com	On behalf of Attorney Lite DePalma Greenberg & Afandaor LLC, Creditor DeSanto Canadian Class Action Plaintiffs and Creditor DiSanto Canadian Class Action Creditors	<input type="checkbox"/> Hand-Delivered <input type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input checked="" type="checkbox"/> Other <u>ECF</u> (As authorized by the Court or by rule. Cite the rule if applicable)

Name and address of Party Served	Relationship of Party to the Case	Mode of Service
Autumn D Highsmith Bankruptcy & Collections Division P. O. Box 12548 Austin, TX 78711-2548		<input type="checkbox"/> Hand-Delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> Other _____ (As authorized by the Court or by rule. Cite the rule if applicable)